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**From:** PAL [mailto:[news@kayakfishingassociationsocal.org](mailto:news@kayakfishingassociationsocal.org)]

**Sent:** Tuesday, March 01, 2005 3:25 PM

**To:** [MLPAComments@resources.ca.gov](mailto:MLPAComments@resources.ca.gov)

**Subject:** MLPAComments: MLPA Draft Master Plan Framework Comments

Paul Lebowitz

Director

Kayak Fishing Association of Southern California

9630 Capricorn Way

San Diego, CA 92126

858-254-3600

[news@kayakfishingassociationsocal.org](mailto:news@kayakfishingassociationsocal.org)

[www.kayakfishingassociationsocal.org](http://www.kayakfishingassociationsocal.org)

MLPA Public Comments

c/o The California Resources Agency

1416 Ninth Street, Suite 1311

Sacramento, CA 95814

Attn: Melissa Miller-Henson

Via email: [MLPAComments@resources.ca.gov](mailto:MLPAComments@resources.ca.gov)

Re: MLPA Draft Master Plan Framework comment

March 1, 2005

Dear Ms. Miller-Henson,

The Kayak Fishing Association of Southern California is pleased to have the opportunity to further comment on the MLPA Draft Master Plan Framework.

Section 2 of the Draft Master Plan Framework deals with Design of MPAs and the MPA Network. The section is long on goals for MPA design, but short on specifics. The document contains no directives on how to achieve the MLPA goals for actual MPA design. In other words, there is no road map that lays out the process of actual MPA design. Since the Master Plan Framework will guide the process statewide, isn't it appropriate to address the mechanics of MPA design at this level, rather than at the local / regional strata?

Another critical piece of the MLPA puzzle is absent from the Master Plan Framework.

Appendix G, Stakeholder Involvement, has not been adopted by the Blue Ribbon Task Force. Public acceptance of the MPA network will require extensive public outreach and involvement in the planning process. The planning process cannot continue past selection of the Central California Study Area without a fully defined strategy for stakeholder involvement, particularly as the Master Plan Framework does not currently provide specific guidance on how to go from goals to actual MPAs.

On page 14 of the Draft Master Plan Framework, the Master Plan Team is cited as having called for consideration of adjacent lands and habitat types, including seabird and pinniped rookeries. Consideration of adjacent land use is understandably important; it is common sense that stormwater pollution from urban areas and runoff from agricultural lands negatively impact marine resources. However, while the MLPA lists in 2851(d) *fish and other marine life*, the focus of the MLPA is clearly on fish and marine invertebrates, not on marine mammals or seabirds which are protected by existing statutes and regulations. MPAs should be designed and placed to meet the goals of the MLPA, *to examine and redesign California's MPA system to increase its coherence and its effectiveness at protecting the state's marine life, habitat, and ecosystems* 2853(a). Protecting marine mammal and seabird rookeries within MPAs should not be a priority during the MPA siting process.

In a similar vein, other sections of the Draft Master Plan Framework call for protection of cultural and geological resources with MPAs. While of intrinsic value, the MLPA is silent on the protection of cultural and geological resources. Therefore, cultural and geological resources should have no bearing on the MPA siting process.

The Draft Master Plan Framework seems to place a priority on Marine Reserves. The lesser protected areas, State Marine Parks and State Marine Conservation Areas, are predominantly contemplated as buffer zones for Marine Reserves. Concerning reserves, the MLPA states:

*Marine life reserves are an essential element of an MPA system 2851(f).*

*An MPA includes marine life reserves and other areas that allow for specified commercial and recreational materials... 2852(c)*

When it comes to the goals of the MLPA:

*The Legislature finds and declares that there is a need to reexamine California's MPA system **to increase its effectiveness** at protecting the state's marine life, habitat, and ecosystems 2853(a).*

*The program may include areas with various levels of protection, and shall include each of the following various elements: An **improved** marine life reserve component... 2853(c) and 2853(c)(1).*

The goals of the MLPA are clearly stated. While marine life reserves are essential elements of MPAs, the act requires the marine reserve component to be improved but does set a requirement for a specific level of improvement. The act does not require marine life reserves to be the dominant centerpieces of MPAs, with marine parks and conservation areas merely relegated to buffer zones. The Draft Master Plan Framework should be revised to allow for a mix of options other than just marine life reserves buffered by marine parks and conservation areas.

Section 5, Monitoring and Evaluation of MPAs, addresses periodic evaluation of MPAs as a key part of adaptive management. The Draft Master Plan Framework makes the point that:

*It is worth noting that the MLPA does not call for monitoring and evaluation of all MPAs, but rather of selected areas (p. 39).*

The phrase “selected areas” is open to broad interpretation. As with other key omissions in the document, specifics should be provided.

Thank-you again for the opportunity to comment on the Draft Master Plan Framework. The KFASC looks forward to future opportunities to contribute to the MLPA planning process.

Sincerely,

Paul Lebowitz